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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW JORDAN-RICHARD SIMMONS,

Defendant.

Case: 1:21-cr-20244
Judge: Ludington, Thomas L.
MJ: Morris, Patricia T.
Filed: 04-07-2021 At 12:06 PM
SEALED MATTER (tt)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
Distribution of Methamphetamine
(21 U.S.C. § 841(a)(1))

On or about January 28, 2021, in the Eastern District of Michigan, Andrew Jordan-Richard Simmons knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, section 841(a)(1).

COUNT TWO
Distribution of Methamphetamine
(21 U.S.C. § 841(a)(1))

On or about February 2, 2021, in the Eastern District of Michigan, Andrew Jordan-Richard Simmons knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, section 841(a)(1).

COUNT THREE
Possession with Intent to Distribute Methamphetamine
(21 U.S.C. § 841(a)(1))

On or about February 2, 2021, in the Eastern District of Michigan, Andrew Jordan-Richard Simmons knowingly possessed with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR
Possession with Intent to Distribute Methamphetamine
(21 U.S.C. § 841(a)(1))

On or about March 10, 2021, in the Eastern District of Michigan, , Andrew Jordan-Richard Simmons knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II

controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATION

Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set for in this.

Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of Defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property

pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

Dated: April 7, 2021

THIS IS A TRUE BILL

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

ANTHONY P. VANCE
Assistant United States Attorney
Chief, Branch Offices

s/Roy R. Kranz
ROY R. KRANZ
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(P56903)

Companion Case information MUST be completed by AU:United States District Court
Eastern District of Michigan**Criminal Case Cov**Case: 1:21-cr-20244
Judge: Ludington, Thomas L.
MJ: Morris, Patricia T.
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to compl

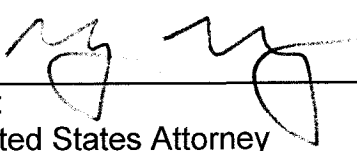
Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: RRK

Case Title: USA v. Andrew Jordan-Richard Simmons**County where offense occurred:** Isabella**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**☒ Indictment/ ☐ Information --- **no prior complaint.**☐ Indictment/ ☐ Information --- based upon prior complaint ☐☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information****Superseding to Case No:** _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

Date: April 7, 2021



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Attorney Bar #: P56903

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.